

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	No. S2-4:09 CR 757 CAS
	)	
JEFFREY GREENWELL,	)	
	)	
Defendant.	)	

**GOVERNMENT'S RESPONSE TO**  
**DEFENDANT'S SENTENCING MEMORANDUM**

COMES NOW the United States of America, by and through the United States Attorney for the Eastern District of Missouri, Richard G. Callahan, and Carrie Costantin, Assistant United States Attorney for said district, and files its Response to Defendant's Sentencing Memorandum.

The Presentence Report (PSR) found a Total Offense Level of 48 and a Criminal History of I. The advisory guideline range is life imprisonment. Defendant has filed a Sentencing Memorandum requesting a sentence of twenty years. The memorandum included a report from William Brown, M.Ed., LPC. The Government requests a sentence of life imprisonment to be accomplished by running several thirty year prison sentences consecutively.

Defendant pled guilty to molesting five boys, photographing that molestation and trading the child pornography images on the internet. Plea Agreement, pp. 2-5. He molested one of the boys for many years and his sexual abuse included oral and anal sex. Some of the other victims were very young, that is, under the age of eight. Plea agreement, pp. 4-5. Defendant generally

met the boys through their mothers or caretakers. He met the mothers either through the internet or work, volunteered to babysit their sons, and then sexually abused the boys. PSR, para. 15, 16, 17, 20.

The report of William Brown, M.Ed. LPC, paints a frightening picture of the defendant. Although defendant stated he was molested as a child, "he never reacted emotionally to any personal history or family historical issues." Brown report, p. 2. He molested two younger step-cousins (ages eight and ten) when he was fifteen years old. Brown report, p. 2. He reported that his offenses all involved children of girlfriends (always females with children). Brown report, p. 2.

Defendant blames everyone except himself for his molestation of the boys. He blames their mothers: "If I would have walked away from these types of women, I wouldn't be in the situation that I am." Brown report, p. 3. He blames the children, describing one as a "horn dog and sex fiend" and another as "loose with his zipper." His sexual molestation of these two boys started when they were eight years old. Brown report, p. 3. He blames the other members of his child pornography trading group. "I know how not to get caught, it's other people who compromised me, and that sucks. I guess that I should have known that I would run into those types of people...it just makes me mad to think about all of this. I told you, I have never been in trouble before at all and this just seems like this is something that could have been avoided if people just would have left me alone." Brown report, p. 4. He blames the police for showing (non-sexual) photos of the victims to area principals in an attempt to identify the victims: "The way they (law enforcement) showed pictures of the children around to the schools (to identify them) just doesn't seem right to me. That's finally how they ended up learning who I was. Does

it seem right to you?" Brown report, p. 4.

Defendant openly admits molesting numerous boys after manipulating their mothers and the children. He admits that he traded child pornography since 1995 and that he traded the molestation photos that he created beginning in 2007. Brown report, p. 3. He has absolutely no remorse for his actions: "Mr. Greenwell also explained that it was the 'thrill' of being able to connect with four females and get away with his addiction; his sexual contact with the four minor males." Brown report, p. 3.

Defendant's egregious conduct warrants a life sentence. He sexually abused at least five boys and traded images of that abuse on the internet. His conduct is akin to others who have molested multiple children: Leland Beasley (3480 months - 4:10 CR 119 CEJ), Michael Martin (1440 months - 4:09 CR 760 JCH), Warren McKinney (life - 4:07 CR 330 CAS) and Michael Devlin (2040 months - 4:07 CR 143 JCH).

For the foregoing reasons, the Government respectfully requests that the Court impose a sentence of life imprisonment by running several thirty year prison sentences consecutively.

Respectfully submitted,  
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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2011, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Ms. JoAnn Trog  
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s/Carrie Costantin  
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